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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric
Company for Approval of 2013-2014 Energy
Efficiency Programs and Budget (U39M).

Application 12-07-001
(Filed July 2, 2012)

And Related Matters.

Application 12-07-002
Application 12-07-003
Application 12-07-004

**RESPONSE OF THE NATURAL RESOURCES DEFENSE
COUNCIL (NRDC) ON THE CALIFORNIA ALTERNATIVE ENERGY
AND ADVANCED TRANSPORTATION FINANCING AUTHORITY'S
MARCH 9, 2015 PROPOSED MODIFICATION TO DECISION 13-09-044
(ENERGY EFFICIENCY FINANCING PILOTS)**

April 3, 2015

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Pursuant to Rules 1.9, 1.10, and 16.4 (f) of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, the Natural Resources Defense Council (NRDC) respectfully submits these comments in response to the March 9, 2015 letter from California Alternative Energy and Advanced Transportation Financing Authority (CAEATFA) proposing modifications to decision 13-09-044 (Energy Efficiency Financing Pilots). NRDC is a non-profit membership organization with nearly 80,000 California members who have an interest in receiving affordable energy services while reducing the environmental impact of California's energy consumption.

NRDC supports the swift implementation of these pilot financing programs, and finds CAEATFA's proposed changes to generally be reasonable, forwarding-looking, and in the spirit of aiming to implement these programs quickly and with an appropriate measure of flexibility that will allow CAEATFA to respond to the needs of customers, contractors, and financial partners.

However, we caution against any modifications to the decision that might be interpreted as requiring additional time before launching these programs. For example, section III.B. of CAEATFA's letter suggests that "Universal EEEMs across all IOU territories would improve program accessibility and transaction volume". We agree that there should not be extremely detailed and different specs for approved measures between different territories. But the solution should not be to delay the programs and launch a Commission process to create a minutely specified list of universal measures. The Commission should consider removing the requirement

that the measures have to be exactly what has been specified in each IOU rebate program, and instead allow what is already required in that territory or “a similar measure in that same category of measure type with a similar level of efficiency,” or other language deemed appropriate by the Commission that will allow reasonable flexibility and confidence on the part of the participants, contractors, and financial partners across the state, but without delaying the roll out of these programs further. If additional and more detailed clarity is deemed necessary down the road, there are ways to make changes later, but given the significant preparation for and anticipation of these programs, we believe the Commission’s priority should be a speedy launch so that we can start learning and benefitting from these pilots as soon as possible.

In addition, NRDC agrees with CAEATFA’s understanding, described in section V., that government entities should be eligible borrowers in the non-residential OBR pilot and we encourage the Commission to emphasize this point in a modified decision.

Dated: April 3, 2015

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M Borgeson", with a stylized flourish at the end.

Merrian Borgeson
Senior Scientist, NRDC